

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

<b>IN RE:</b>	)	
<b>KEVIN L. NORRIS</b>	)	<b>CASE NO.: 2:20-bk-14781-MDC</b>
	)	<b>CHAPTER 13</b>
<b>DEBTOR</b>	)	<b>JUDGE MAGDELINE D. COLEMAN</b>
	)	
<b>MCLP ASSET COMPANY, INC.</b>	)	
	)	
<b>CREDITOR</b>	)	
	)	
<b>KEVIN L. NORRIS, DEBTOR AND</b>	)	
<b>KENNETH E. WEST, TRUSTEE</b>	)	
	)	
<b>RESPONDENTS</b>	)	

**CERTIFICATE OF DEFAULT**

I, Joshua I. Goldman, Esquire, attorney for Movant, certify that the Debtor has defaulted under the terms of the Stipulation between the parties that was approved by the Court per the Court's Order entered on October 14, 2021 (Document No. 35 and 36). It is further certified that the attached Notice of Defaults dated October 6, 2022, and July 24, 2023, was served upon Debtor's counsel on said date appearing on the notice. Debtor has failed to cure the default subsequent to said notice. Accordingly, per the terms of the Stipulation, the Court shall enter an Order granting Movant relief from the automatic stay. A proposed Order is attached hereto and filed herewith.

**DATED** this the 10<sup>th</sup> day of August 2023.

Respectfully submitted,

/s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
[josh.goldman@padgettlawgroup.com](mailto:josh.goldman@padgettlawgroup.com)  
*Attorney for Movant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 10<sup>th</sup> day of August 2023:

*DEBTOR*

KEVIN L NORRIS  
831 E PENN PINES BLVD  
ALDAN, PA 19018

*ATTORNEY FOR DEBTOR*

BRAD J. SADEK  
SADEK AND COOPER  
1500 JFK BOULEVARD  
STE 220  
PHILADELPHIA, PA 19102  
BRAD@SADEKLAW.COM

*TRUSTEE*

KENNETH E. WEST  
OFFICE OF THE CHAPTER 13 STANDING TRUSTEE  
1234 MARKET STREET - SUITE 1813  
PHILADELPHIA, PA 19107  
ECFMAIL@READINGCH13.COM

*U.S. TRUSTEE*

OFFICE OF UNITED STATES TRUSTEE  
200 CHESTNUT STREET  
SUITE 502  
PHILADELPHIA, PA 19106  
USTPREGION03.PH.ECF@USDOJ.GOV

/s/ Joshua I. Goldman

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Pennsylvania Bar # 205047  
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*Counsel for Movant*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

---

**IN RE:**

<b>KEVIN L. NORRIS</b>	)	<b>CASE NO.: 2:20-bk-14781-elf</b>
<b>DEBTOR</b>	)	<b>CHAPTER 13</b>
	)	<b>JUDGE ERIC L. FRANK</b>

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**NOTICE OF DEFAULT FOR REAL PROPERTY LOCATED AT  
AT 831 EAST PENN PINES BLVD., ALDAN, PA 19018**

**COMES NOW** Joshua I. Goldman, Esq. of the law firm of Padgett Law Group, and files this notice on behalf of MCLP Asset Company, Inc. (hereinafter “Secured Creditor”) to notify that Debtor is in default of the Stipulation and Order entered on October 14, 2021 for the real property located at **831 East Penn Pines Blvd., Aldan, PA 19018** (the “Property”).

1. Pursuant to the Stipulation [D.E. 35], Order entered on October 14, 2021, *“In the event Debtor should default on his obligations under this Stipulation by failing to make ongoing payments as set forth above in Section II, Paragraph 3 on or before the dates on which they are due, then Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity, but Solely as Legal Title Trustee for BCAT 2016-17TT, its successors and/or assigns shall serve Debtor’s attorney by fax, email and/or regular mail, with written notification of default. In the event that Debtor fails to cure the default within fifteen (15) days of the date of the written notification, then Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity, but Solely as Legal Title Trustee for BCAT 2016-17TT may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, where upon Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity,*

*but Solely as Legal Title Trustee for BCAT 2016-17TT, or its assignee or successors may exercise its rights against the Mortgaged Property under the terms of this Stipulation without further notice to Debtor or the Order of this Court."*

2. As of the date of this notice, Debtor is in default of the Stipulation for failure to make post-petition payments and Stipulation payments and is currently delinquent in the amount of \$2,038.24.

**DATED** this the 6<sup>th</sup> day of October 2022.

Respectfully submitted,

/s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
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[josh.goldman@padgettlawgroup.com](mailto:josh.goldman@padgettlawgroup.com)  
Attorney for Secured Creditor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 6<sup>th</sup> day of October 2022:

/s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
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josh.goldman@padgettlawgroup.com  
*Counsel for Creditor*

**SERVICE LIST (CASE NO. 2:20-bk-14781-elf)**

*DEBTOR*

KEVIN L NORRIS  
831 E PENN PINES BLVD  
ALDAN, PA 19018

*ATTORNEY FOR DEBTOR*

BRAD J. SADEK  
SADEK AND COOPER  
1500 JFK BOULEVARD  
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PHILADELPHIA, PA 19102  
BRAD@SADEKLAW.COM

*TRUSTEE*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
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**IN RE:**

**KEVIN L. NORRIS**  
**DEBTOR**

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CASE NO.: 2:20-bk-14781-mdc

## CHAPTER 13

## JUDGE MAGDELINE D. COLEMAN

**NOTICE OF DEFAULT FOR REAL PROPERTY LOCATED AT**  
**AT 831 EAST PENN PINES BLVD., ALDAN, PA 19018**

**COMES NOW** Joshua I. Goldman, Esq. of the law firm of Padgett Law Group, and files this notice on behalf of MCLP Asset Company, Inc. (hereinafter “Secured Creditor”) to notify that Debtor is in default of the Stipulation and Order entered on October 14, 2021 for the real property located at **831 East Penn Pines Blvd., Aldan, PA 19018** (the “Property”).

1. Pursuant to the Stipulation [D.E. 35], Order entered on October 14, 2021, “*In the event Debtor should default on his obligations under this Stipulation by failing to make ongoing payments as set forth above in Section II, Paragraph 3 on or before the dates on which they are due, then Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity, but Solely as Legal Title Trustee for BCAT 2016-17TT, its successors and/or assigns shall serve Debtor’s attorney by fax, email and/or regular mail, with written notification of default. In the event that Debtor fails to cure the default within fifteen (15) days of the date of the written notification, then Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity, but Solely as Legal Title Trustee for BCAT 2016-17TT may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, where upon Selene Finance LP as attorney in Fact for U.S. Bank, N.A., not in Its Individual Capacity,*

*but Solely as Legal Title Trustee for BCAT 2016-17TT, or its assignee or successors may exercise its rights against the Mortgaged Property under the terms of this Stipulation without further notice to Debtor or the Order of this Court."*

2. As of the date of this notice, Debtor is in default of the Stipulation for failure to make post-petition payments and Stipulation payments for the months of May 1, 2023 through July 1, 2023 for an arrearage of \$3,364.92 with \$1,023.17 for a total arrearage amount of \$2,341.

**DATED** this the 24<sup>th</sup> day of July 2023.

Respectfully submitted,

/s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
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6267 Old Water Oak Road, Suite 203  
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[josh.goldman@padgettlawgroup.com](mailto:josh.goldman@padgettlawgroup.com)  
Attorney for Secured Creditor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 24<sup>th</sup> day of July:

/s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
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